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Attorneys for Debtors

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

DANIEL GEORGE JOHN TARKANIAN and
AMY MICHELLE TARKANIAN,

Debtors.

Case No.: BK-S-13-20495-MKN
Chapter 7

Date: October 23, 2014
Time: 2:30 p.m.
Place: Courtroom II (Third Floor)

**DECLARATION OF DANIEL TARKANIAN IN SUPPORT OF
DEBTORS' REPLY TO OPPOSITION TO MOTION TO COMPEL
ABANDONMENT OF RESIDENCE PURSUANT TO 11 U.S.C. § 554(b)(2)**

I, Daniel Tarkanian, hereby declare as follows:

1. I am over the age of 18 and am mentally competent. I have personal knowledge of the facts in this matter and if called upon to testify, could and would do so consistent herewith. I make this declaration in support of the *Debtors' Reply to Opposition to Motion to Compel Abandonment of Residence Pursuant to 11 U.S.C. § 554(B)(2)* in the above-captioned chapter 7 bankruptcy cases.

2. The Daniel and Amy Revocable Family Trust owns that certain real property commonly known as 3008 Campbell Circle, Las Vegas, Clark County, Nevada, having APN 139-32-212-004 (the "Campbell Residence"). My wife and family have resided full-time in the Campbell Residence since we purchased the property in 2005, it is and remains our primary residence, and we intend to remain there for at least the immediate future given that it is close to

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1 my ailing parents, which proximity allows me to care for them.

2 3. Attached hereto as **Exhibit "1"** is a true and correct copy of a "Property Account
3 Inquiry – Summary Screen" on the Campbell Residence as recently printed out from the Clark
4 County Assessor's Office website, which indicates that all property taxes on the property are paid
5 in full and current. I am aware that the property taxes remain current because such funds are
6 impounded as part of my payments to Ocwen Loan Servicing, LLC, which holds a first priority
7 consensual lien on the Campbell Residence, and which payments my wife and I have continued to
8 make prior to and throughout the filing of our chapter 7 bankruptcy cases.

9 I declare under penalty of perjury of the laws of the United States that these facts are true
10 to the best of my knowledge and belief.

11 Dated: October 16th, 2014.

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13 DANIEL TARKANIAN
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